

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.) CASE NO. 1:08 CV 2755
)
Plaintiff,) JUDGE: LESLEY WELLS
)
-vs-) **PLAINTIFF'S WITNESS LIST**
)
SAP AMERICA, INC., et al.)
)
Defendants.)

Plaintiff Hodell-Natco Industries, Inc., through undersigned counsel and pursuant to the Court's Trial Order and at the Court's request expressed during the Final Pretrial held February 18, 2015, submits the following list of witnesses Plaintiff expects to call to testify at the trial of this matter set for February 23, 2015:

A. Fact Witnesses Expected to be Called at Trial.

Plaintiff expects that the testimony of certain witnesses as identified below may be presented by deposition (including by videotape) in the event Plaintiff is unable to secure the witness's in-person testimony. Plaintiff reserves the right to present the in-person testimony of any witness listed below to the extent possible:

1. Kevin Reidl (expected to testify in person) (May be contacted through Plaintiff's counsel)
2. Daniel Lowery (cross) (expected to testify in person) (Represented by Chris Kellett; Carmody MacDonald P.C.. 120 S. Central Avenue, Suite 1800, St. Louis, MO 63105 (314) 854-8635 – May be contacted through counsel)
3. Paul Killingsworth (cross) (expected to testify in person per agreement of SAP) (Represented by counsel for SAP)

4. Edward Neveux (cross) (expect to testify in person per agreement of SAP)
(Represented by counsel for SAP)
5. Udi Ziv (cross) (testimony expected to be presented by videotape deposition) (8 Hapnina Street, 43107 Ra'anana, Israel)(Represented by counsel for SAP)
6. Jon Woodrum (cross) (testimony expected to be presented by videotape deposition) (represented by Schultz & Associates, 640 Cepi Drive, Suite A, 18 Chesterfield, Missouri 63005)
7. Dale Van Leeuwen (cross) (expected to testify live by contemporaneous video transmission) (40037 Red Hawk Court, St. Charles, IL 60175, (630) 659-9549)
8. Geoffrey Ashley (cross) (testimony expected to testify live by contemporaneous video transmission) (Represented by counsel for SAP)
9. Joseph Vislocky (expected to testify in person)(14715 Teal Dr., Chardon, Ohio 44024, (216) 780-8878)
10. Jaime Clarke (expected to testify in person)(7825 Hub Pkwy, Cleveland, OH 44125)
11. Otto Reidl (expected to testify in person)(May be contacted through Plaintiff's counsel)
12. Ralf Mehnert-Meland (cross) (expected to testify in person per agreement of SAP) (Represented by counsel for SAP)
13. Daniel Kraus (cross) (expected to testify in person per agreement of SAP)
(Represented by counsel for SAP)

B. Expert Witnesses:

1. Helmuth Guembel (Expert Witness)(expected to testify in person) (Postfach 77, CH-7550 Scuol, Switzerland, +41-81-8600310)
2. Dr. G. William Kennedy (Expert Witness)(expected to testify in person) (28 State Street, 28th Floor, Boston, MA 02109, (617) 925-4059)

Plaintiff reserves the right to call any rebuttal witnesses and any witness called or identified by Defendants SAP America, Inc. and SAP AG. Plaintiff reserves the right to amend this witness list prior to the commencement of trial.

Dated: February 18, 2014

Respectfully submitted,

/s/ P. Wesley Lambert

Christopher J. Carney (0037597)

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of February, 2015, a copy of the foregoing was filed electronically using the Court's electronic filing system. Parties may access the document through the Court's electronic filing system.

/s/ P. Wesley Lambert

P. WESLEY LAMBERT (0076961)

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